

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )

)

)

v. )

)

)

ANGELO TROVATO )

)

)

)

**06 CR 10332 NG**

CRIMINAL NO.

VIOLATION

18 U.S.C. § 2423(b)

Travel to Engage in

Illicit Sexual Conduct

18 U.S.C. § 2422(b)

Coercion and Enticement

Criminal Forfeiture

18 U.S.C. § 2253(a)

INDICTMENT

COUNT ONE: 18 U.S.C. § 2423(b) - Travel with Intent to  
Engage in Illicit Sexual Conduct

The Grand Jury charges that:

On or about August 19, 2006, in the District of  
Massachusetts and elsewhere,

ANGELO TROVATO,

the defendant herein, traveled in interstate commerce for the  
purpose of engaging in illicit sexual conduct as defined in 18  
U.S.C. § 2423(f), that is, a sexual act with a person under the  
age of 18 years of age that would be in violation of Chapter 109A  
of the United States Code if the sexual act had occurred in the  
special maritime and territorial jurisdiction of the United  
States.

All in violation of Title 18, United States Code, Sections  
2423(b) and (f) and 2243(a).

COUNT TWO: 18 U.S.C. § 2422(b) - Coercion and Enticement

The Grand Jury further charges that:

Between on or about February 18, 2006, through on or about August 19, 2006, in the District of Massachusetts and elsewhere,

ANGELO TROVATO,

the defendant herein, did knowingly attempt to use a facility and means of interstate commerce, to wit, the Internet, to persuade, induce, entice, and coerce an individual, that is John Doe, who was at that time purporting to be under the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense, to wit, sexual activity by a person 40 years old with a person under the age of 16 years, in violation of Massachusetts General Laws Chapter 265, § 24.

In violation of Title 18, United States Code, Section 2422(b).

**FORFEITURE ALLEGATION**

(18 U.S.C. §2253(a))

1. The allegations of Counts One and Two of this indictment are hereby re-alleged and are incorporated herein by reference for the purpose of alleging forfeiture, pursuant to Title 18, United States Code, Section 2428.
2. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 2422 and 2423 set forth in Counts One and Two of this indictment, ANGELO TROVATO, the defendant herein, shall forfeit to the United States all interest in:

(A) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and

(B) any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.

The property to be forfeited includes any and all items seized from ANGELO TROVATO on or about August 19, 2006.

All in accordance with Federal Rule of Criminal Procedure 32.2 and Title 18, United States Code, Section 2428(b).

If any of the above-described property, as a result of any act or omission of the defendant -

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

the court shall order, pursuant to 18 U.S.C. §2428, the forfeiture of any other property of the defendant up to the value of the property described above.

All in accordance with Federal Rule of Criminal Procedure  
32.2 and Title 18, United States Code, Section 2428.

A TRUE BILL

Emily A. Madagnoli  
FOREPERSON OF THE GRAND JURY

David A. Sullivan  
ASSISTANT UNITED STATES ATTORNEY

DISTRICT OF MASSACHUSETTS; October 11, 2006

Returned into the District Court by the Grand Jurors and  
filed.

Michael S. Sullivan  
DEPUTY CLERK

10/11/06  
MSJ 3-2

## Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: Wrentham Category No. II Investigating Agency FBICity Wrentham Related Case Information:

County Norfolk Superseding Ind./ Inf. \_\_\_\_\_ Case No. \_\_\_\_\_  
 Same Defendant x New Defendant \_\_\_\_\_  
 Magistrate Judge Case Number 06-1681-TSH  
 Search Warrant Case Number \_\_\_\_\_  
 R 20/R 40 from District of \_\_\_\_\_

## Defendant Information:

Defendant Name Angelo Trovato Juvenile ☐ Yes ☒ No

Alias Name \_\_\_\_\_

Address 20 Oak Street, Deer Park, New YorkBirth date (Year only): 44 SSN (last 4 #): 1454 Sex m Race: \_\_\_\_\_ Nationality: \_\_\_\_\_

Defense Counsel if known: \_\_\_\_\_ Address: \_\_\_\_\_

Bar Number: \_\_\_\_\_

## U.S. Attorney Information:

AUSA Dana Gershengorn Bar Number if applicable \_\_\_\_\_Interpreter: ☐ Yes ☒ No List language and/or dialect: \_\_\_\_\_Victims: ☐ Yes ☒ No If Yes, are there multiple crime victims under 18 U.S.C. §3771(d)(2) ☐ Yes ☐ NoMatter to be SEALED: ☐ Yes ☒ No☐ Warrant Requested☐ Regular Process☒ In Custody

## Location Status:

Arrest Date: 8/19/06☒ Already in Federal Custody as detained in \_\_\_\_\_☐ Already in State Custody \_\_\_\_\_ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by \_\_\_\_\_ on \_\_\_\_\_Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony 18 USC 2423(b)

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: October 11, 2006Signature of AUSA: [Signature]

016-1-9392 NG

District Court Case Number (To be filled in by deputy clerk):

Name of Defendant Angelo Trovato

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. 2423(b)</u>	<u>Travel to engage in illicit sexual conduct</u>	<u>1</u>
Set 2	<u>18 U.S.C. 2422(b)</u>	<u>Attempted enticement of a minor</u>	<u>2</u>
Set 3	<u></u>	<u></u>	<u></u>
Set 4	<u></u>	<u></u>	<u></u>
Set 5	<u></u>	<u></u>	<u></u>
Set 6	<u></u>	<u></u>	<u></u>
Set 7	<u></u>	<u></u>	<u></u>
Set 8	<u></u>	<u></u>	<u></u>
Set 9	<u></u>	<u></u>	<u></u>
Set 10	<u></u>	<u></u>	<u></u>
Set 11	<u></u>	<u></u>	<u></u>
Set 12	<u></u>	<u></u>	<u></u>
Set 13	<u></u>	<u></u>	<u></u>
Set 14	<u></u>	<u></u>	<u></u>
Set 15	<u></u>	<u></u>	<u></u>

ADDITIONAL INFORMATION: